

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

CLERK
U.S. DISTRICT COURT
DISTRICT OF NEW JERSEY
RECEIVED

2016 NOV 22 P 2:37

Bradford C Jurey
146th Grove St apt 105
East Orange NJ 07017
(In the space above enter the full name(s) of the plaintiff(s).)

- against -

The stop and shop supermarket
Company LLC
8 Franklin Street store #800

COMPLAINT

Jury Trial: ☐ Yes ☐ No
(check one)

(In the space above enter the full name(s) of the defendant(s). If you cannot fit the names of all of the defendants in the space provided, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed in the above caption must be identical to those contained in Part I. Addresses should not be included here.)

I. Parties in this complaint:

- A. List your name, address and telephone number. Do the same for any additional plaintiffs named. Attach additional sheets of paper as necessary.

Plaintiff	Name	_____
	Street Address	_____
	County, City	_____
	State & Zip Code	_____
	Telephone Number	_____

The moment you join the Union and you pay your admission fee get your Union Card and that is when your seniority starts. Companies come and go but Workers stay the same unless the Company does not sign the contract and they must close the stores for at least a month or more.

The Union runs everything from seniority to the (pension). My job was Meat Cutting, that's what I was hired as and responsible for. It is the only thing I can be fired for and the Company doesn't have anything to do with seniority. The company (Stop and Shop) gets hours sent to the store for cleaning crews and if they don't use them for that purpose they cannot hold anyone responsible for cleaning, especially when they have their own work to do.

Stop and Shop totally ignored rules in my contract and set me up for termination.

1. It is required by the State of New Jersey to have a cleaning crew. Hours get sent to the store for that purpose. I am not responsible for cleaning, I was hired for Meat cutting.
2. There was no collective bargaining agreement, the Company (Stop and Shop) signed the contract. I was violated by the company by taking me out of the contract and took Pay, Vacation, Sick and Personal time and made me work after 9:00am. That is discrimination to me. No one else that worked and came from Grand Union was violated that way in which I started with them back in 1981.
3. I had to work 2 days 12:30-9:00 pm as a Meat Cutter, meat wagger cleaning crew and meat clerk. However I was hired as a meat cutter ONLY under contract and they expected one person to do all of this...Cleaning and sanitizing alone takes 4 hours.
4. I started working as a Meat Cutter back in 1974 with Foodtown and was laid off in 1977. When you get your Union Card, that is when your seniority begins and Stop and Shop purchased Foodtown and claimed my former employer Marty Mezer had no record, stated He can't find the record And I know several people who I worked with me has proof.
5. If there was any agreements between the Union and The Company it is not in the contract so it means nothing. A collective bargaining Agreement involves all the Company's under contract and all the Union Members votes on the decision that they put into contract.
6. So violating my contract is discrimination and terminating me was unjust.

- B. List all defendants. You should state the full name of the defendants, even if that defendant is a government agency, an organization, a corporation, or an individual. Include the address where each defendant can be served. Make sure that the defendant(s) listed below are identical to those contained in the above caption. Attach additional sheets of paper as necessary.

Defendant No. 1 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 2 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 3 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

Defendant No. 4 Name _____
 Street Address _____
 County, City _____
 State & Zip Code _____

II. Basis for Jurisdiction:

Federal courts are courts of limited jurisdiction. There are four types of cases that can be heard in federal court: 1) Federal Question - Under 28 U.S.C. § 1331, a case involving the United States Constitution or federal laws or treaties is a federal question case; 2) Diversity of Citizenship - Under 28 U.S.C. § 1332, a case in which a citizen of one state sues a citizen of another state and the amount in damages is more than \$75,000 is a diversity of citizenship case; 3) U.S. Government Plaintiff; and 4) U.S. Government Defendant.

- A. What is the basis for federal court jurisdiction? (*check all that apply*)

☐ Federal Questions ☐ Diversity of Citizenship
☐ U.S. Government Plaintiff ☐ U.S. Government Defendant

- B. If the basis for jurisdiction is Federal Question, what federal Constitutional, statutory or treaty right is at issue? _____

C. If the basis for jurisdiction is Diversity of Citizenship, what is the state of citizenship of each party?

Plaintiff(s) state(s) of citizenship _____

Defendant(s) state(s) of citizenship _____

III. Statement of Claim:

State as briefly as possible the facts of your case. Describe how each of the defendants named in the caption of this complaint is involved in this action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If you intend to allege a number of related claims, number and set forth each claim in a separate paragraph. Attach additional sheets of paper as necessary.

A. Where did the events giving rise to your claim(s) occur? _____

B. What date and approximate time did the events giving rise to your claim(s) occur? _____

C. Facts: _____

What
happened
to you?

Who did
what?

Was
anyone
else
involved?

Who else
saw what
happened?

IV. Injuries:

If you sustained injuries related to the events alleged above, describe them and state what medical treatment, if any, you required and received. _____

V. Relief:

State what you want the Court to do for you and the amount of monetary compensation, if any, you are seeking, and the basis for such compensation.

I declare under penalty of perjury that the foregoing is true and correct.

Signed this 22 day of Tuesday, 2016.

Signature of Plaintiff Bradford C Ivory
Mailing Address 146th Grove st
East Orange NJ 07017
Telephone Number 862-944-2939
Fax Number (if you have one) none
E-mail Address none

Note: All plaintiffs named in the caption of the complaint must date and sign the complaint.

Signature of Plaintiff: Bradford C Ivory